

1 Q Aside from the fax copy that you got that said  
2 "opposition" on it, when was the first time you ever saw  
3 this document, Exhibit 2?

4 A Today.

5 Q Today?

6 A Yes.

7 Q Okay. Did you ever authorize any response to the  
8 Net Wave petition be filed with the FCC in your name, back  
9 in 1997? When the opposition was filed?

10 A No.

11 Q Did you know any response was going to be filed  
12 in your name?

13 A No.

14 Q Did you have any conversations with Ron about him  
15 filing anything with the FCC in response to the Net Wave  
16 petition?

17 A No.

18 Q Any conversations with Pat?

19 A No.

20 Q Any conversations with anybody else at DLB about  
21 that?

22 A No.

23 Q Mrs. Sumpter, would you turn to Exhibit 46?

24 (Pause.)

25 Q Do you recognize this document?

- 1           A     Yes.
- 2           Q     What is it?
- 3           A     Something Ron brought into the office for me to  
4 sign, to fill out.
- 5           Q     It is just a piece of paper Ron brought to you?
- 6           A     Yes.
- 7           Q     Do you know what it is supposed to be? What the  
8 purpose of this piece of paper is?
- 9           A     Well, I thought it was a transfer. That's what  
10 he told me it was.
- 11          Q     Transfer of what?
- 12          A     To transfer the license out of my name.
- 13          Q     What license?
- 14          A     It's WPJR739.
- 15          Q     And do you know what license that is?
- 16          A     I think it's the one that was in dispute. I'm  
17 not sure.
- 18          Q     In dispute in what?
- 19          A     On the ones we had in the deposition.
- 20          Q     Does WPJR739, do you relate that to any specific  
21 license or license application?
- 22          A     No, not really.
- 23          Q     You said Ron brought this document to you?
- 24          A     Yes.
- 25          Q     Was it already completed?

1           A     No.

2           Q     Whose handwriting is it in the numbered paragraph  
3 two, where it says 90?

4           A     That's mine.

5           Q     Do you know what that signifies, that 90?

6           A     No.

7           Q     Okay. Whose handwriting is it in the numbered  
8 paragraph three, where it says 2-6-97?

9           A     Mine.

10          Q     Do you know what the significance of that  
11 numbered sentence is, number three?

12          A     No, ma'am.

13          Q     Do you know what that means?

14          A     No.

15          Q     How about number four, sentence number four?  
16 Where it says 483,5625 degrees. Do you see that?

17          A     Yes.

18          Q     Who wrote that?

19          A     I did.

20          Q     Who told you what to put in there?

21          A     Ronald did.

22          Q     Do you know what that is supposed to mean?

23          A     No.

24          Q     How about sentence number five? Did you put the  
25 writing in sentence, sentence number five?

1           A     Yes.

2           Q     What does that mean?

3           A     It doesn't mean anything to me.

4           Q     Who told you to put that in there?

5           A     Ronald.

6           Q     And gave you specific, told you specifically what  
7 to write?

8           A     He was standing over me.

9           Q     Okay. But you did state that this is your  
10 signature at the bottom of the page?

11          A     Yes, ma'am.

12          Q     And did you also write the date?

13          A     Yes.

14          Q     Okay. Did Ronald give you any indication as to  
15 what this document was for?

16          A     He told me it was a transfer.

17          Q     Did he tell you what it was transferring?

18          A     To get this license out of my name.

19          Q     When you say "this license," what license are you  
20 talking about?

21          A     The one that, on the heading here, call sign  
22 WPJR739.

23                 THE REPORTER: I had trouble hearing that, Your  
24 Honor.

25                 If you could just rotate the mike towards you a

1 bit. Thank you.

2 JUDGE STEINBERG: Do you want to state the answer  
3 again, please?

4 THE WITNESS: Call sign WPJR739.

5 BY MS. LANCASTER:

6 Q Did he explain what call sign WPJR739 is, or was?

7 A No.

8 Q Did you think that WPJR739 was the license that  
9 was talked about in the Net Wave petition?

10 A I thought it was.

11 Q That was your understanding?

12 A That was my understanding.

13 Q Did Jim also sign a similar document to this?

14 A Yes.

15 Q Okay. Do you know what date Ron brought this to  
16 you?

17 A Twelve/16/97, the date that is on it.

18 Q Okay. So you signed it right away?

19 A Yes.

20 Q Do you recall the circumstances of, surrounding  
21 when he brought the document to you?

22 A Well, yes.

23 Q What were they?

24 A He came into the office about 4 o'clock one  
25 afternoon. And I was at the front desk. And he threw

1 these, what he told me were transfers, down in front of me,  
2 and told me that I had to sign this to get them out of my  
3 name, and fill this page out.

4 Q Okay. You are talking in the plural. When you  
5 say he threw transfers in front of you, how many did he  
6 throw down in front of you?

7 A Four.

8 Q Were they all in your name?

9 A No.

10 Q Whose names were they in?

11 A Mine, Jennifer's, Melissa's, and Jim's.

12 Q How about the ones that were the other names?  
13 Did he have any requests or instructions regarding those?

14 A He wanted the girls to sign them.

15 Q He wanted everybody to sign their own?

16 A Yes.

17 Q What did you do with the others?

18 A Gave them back to him. The girls weren't there,  
19 so they couldn't sign them.

20 Q Okay, how about the one in Jim's name? What did  
21 you do with that one?

22 A I took it to him, in his office.

23 JUDGE STEINBERG: To Jim?

24 THE WITNESS: Yes.

25 BY MS. LANCASTER:

1 Q And did you say anything to Jim when you took it  
2 to him?

3 A Yes.

4 Q What did you tell him?

5 A I told him it was a transfer, and that Ronald  
6 wanted us to sign them.

7 Q And did Jim have any response to that?

8 A Yes. He looked at it, and he told me it was not  
9 a transfer. I said, "Well, I have already signed mine."  
10 That is when he went out to talk to Ronald.

11 Q And so Jim went out and talked to Ronald? Were  
12 you there when they were having that conversation?

13 A Yes.

14 Q What was said?

15 A Jim told Ronald that these were not transfers.

16 Q Did Ronald have a response?

17 A He said well, we had to sign them to get the  
18 transfers through.

19 Q Now, when you are talking about transfers, was it  
20 your understanding at that time that you were always talking  
21 about transfers of the licenses that were --

22 MR. ROMNEY: Objection. Leading. Your Honor,  
23 excuse me.

24 JUDGE STEINBERG: Yes. I think you should ask  
25 what were you talking --

1 MS. LANCASTER: Just trying to speed it along a  
2 little bit, Your Honor. I am sorry. I will not.

3 BY MS. LANCASTER:

4 Q What transfers was it your understanding that Ron  
5 was talking about?

6 A The ones that were in the Net Wave petition.

7 Q And who had licenses mentioned in the Net Wave  
8 petition, as you understood it?

9 A Well --

10 JUDGE STEINBERG: In your family.

11 BY MS. LANCASTER:

12 Q That you were concerned about.

13 A In my family?

14 Q Yes.

15 A My daughter, Jennifer; my daughter, Melissa; Jim;  
16 and myself.

17 Q Did Jim end up signing the document that was  
18 presented to him?

19 A Yes.

20 Q Did you see him do that?

21 A Yes.

22 Q And what happened to, again, what happened to the  
23 document that you stated Ron had brought in for Melissa and  
24 Jennifer?

25 A He took them with him.



1 Q He left with them?

2 A Yes.

3 Q You did not keep those?

4 A No.

5 JUDGE STEINBERG: Who is he? "He" left with

6 them.

7 THE WITNESS: Ronald.

8 BY MS. LANCASTER:

9 Q Would you please turn to Exhibit 48? Do you

10 recognize this document?

11 A Yes.

12 Q What is it?

13 A What is it?

14 Q Yes, ma'am.

15 A It's a letter we sent Ronald and Pat.

16 Q When you say we sent, who sent it?

17 A Jim and I.

18 Q Is this letter, in front of you in Exhibit 48,

19 from Jim?

20 A No, it's from me.

21 Q Okay. Is it your testimony that Jim also sent a

22 letter?

23 A Yes.

24 Q But this one is from you?

25 A Yes.

1 Q Is that your signature at the bottom of the page?

2 A Yes.

3 Q When was this letter sent to Ron and Pat?

4 A I assume the date that is on there. December 20.

5 Q Do you recall?

6 A Yes. December 20.

7 Q Thank you. In the first sentence of this

8 exhibit, in this letter, you say that you signed a letter

9 from the FCC dated 11/17/97. What letter from the FCC are

10 you talking about when you say that? Is it Exhibit 46?

11 A I believe it's Exhibit 46. Yes, it's Exhibit 46.

12 Q The next sentence of Exhibit 48, you indicate

13 that you have been advised that you qualify for this

14 license, and that you furnished all information. What

15 license are you talking about in that sentence?

16 A The license WPJR739.

17 Q The third sentence of Exhibit 48 you state that

18 the application for that license was your idea. By your

19 idea, you mean Ron and Pat's idea?

20 A That's correct.

21 Q Okay. Did you, what did you mean -- explain the

22 purpose in your mind for sending this letter.

23 A Well, we got concerned after we had signed this

24 form that maybe we shouldn't have signed it.

25 Q When you say "this form," what form are you

1 talking to?

2 A Eight hundred A.

3 Q The 800-A?

4 A Yes.

5 Q Which is Exhibit 46?

6 JUDGE STEINBERG: Let the record reflect that the  
7 witness was pointing to Exhibit 46.

8 BY MS. LANCASTER:

9 Q Okay, go ahead. You got concerned, and?

10 A Yes, we were concerned that we probably shouldn't  
11 have signed them. We just let Ron know how we felt about  
12 it.

13 Q Who wrote this letter?

14 A Jim.

15 Q Before he wrote the letter, had you had  
16 discussions with him about this matter?

17 A Yes.

18 Q Is there anything in this letter that you  
19 disagree with?

20 A No.

21 Q Is there anything that you would have liked to  
22 have been put in this letter that he did not put in?

23 A No.

24 Q At the time that you signed this letter, did you,  
25 in your mind, did you mean to imply that --

1 MR. ROMNEY: Objection, Your Honor. That is  
2 leading.

3 JUDGE STEINBERG: What did you mean to imply.

4 BY MS. LANCASTER:

5 Q What did you mean to -- well --

6 JUDGE STEINBERG: No, that is too vague.

7 BY MS. LANCASTER:

8 Q When you signed this letter, did you think that  
9 you had signed --

10 MR. ROMNEY: Objection, Your Honor.

11 MS. LANCASTER: Wait.

12 JUDGE STEINBERG: It is starting to be leading.  
13 Did you think that, and then you are going to provide what  
14 she thought.

15 BY MS. LANCASTER:

16 Q How was this letter connected to the license that  
17 was granted in 1996?

18 JUDGE STEINBERG: I do not think the witness  
19 understands the question.

20 THE WITNESS: I don't.

21 BY MS. LANCASTER:

22 Q What did you mean by the words "my application,"  
23 in the third sentence of this letter.

24 A I was referring to this one, that he had us fill  
25 out.

1 JUDGE STEINBERG: "This" being, the --

2 THE WITNESS: Forty-six.

3 JUDGE STEINBERG: -- witness is pointing to 46.

4 I think it is absolutely clear what this license is, and  
5 what this "my application" was.

6 And in the third sentence, when you are talking  
7 about my application, what did you intend? What did that  
8 reference in your own mind?

9 THE WITNESS: What did it reference?

10 JUDGE STEINBERG: Yes.

11 THE WITNESS: This here form that we filled out.

12 JUDGE STEINBERG: Okay. "This here form" is  
13 Exhibit 46.

14 THE WITNESS: Uh-huh.

15 JUDGE STEINBERG: Okay.

16 BY MS. LANCASTER:

17 Q After you sent this letter, did you get any  
18 response to it?

19 A I don't remember getting any. I don't know.

20 Q Turn to Exhibit 34, page 28. Is that the right  
21 page?

22 JUDGE STEINBERG: Yes, you might want to take a  
23 look at the first page of 34, so you get a frame of  
24 reference as to what it is. Then you can look at as much  
25 before page 28 or after 28 as you like.

1 (Witness examines document.)  
2 JUDGE STEINBERG: Okay, the witness is ready.  
3 BY MS. LANCASTER:  
4 Q Have you found it?  
5 A Yes, ma'am.  
6 Q Do you recognize this document?  
7 A Yes, ma'am.  
8 Q What is it?  
9 A It's a letter from Ronald.  
10 Q Did you receive it?  
11 A I don't remember ever receiving it.  
12 Q Have you seen it before?  
13 A Not now. I see it right now.  
14 Q Is this the first time you have ever seen it?  
15 A I believe it is. I don't remember ever seeing it  
16 before.  
17 Q Okay. Look at Exhibit 20, page 19.  
18 A Twenty?  
19 Q Yes, ma'am. Wait a minute, I might have the  
20 wrong -- no. Exhibit 20, page 19.  
21 (Pause.)  
22 JUDGE STEINBERG: What exhibit number is it  
23 again?  
24 MS. LANCASTER: Exhibit 20, page 19.  
25 JUDGE STEINBERG: Two-oh? I think you are on the

1 wrong exhibit.

2 MS. LANCASTER: Let me see if I can help you.

3 JUDGE STEINBERG: Oh, no.

4 MS. LANCASTER: No, here it is, right here.

5 JUDGE STEINBERG: That is something else.

6 MS. LANCASTER: Right in front of you.

7 BY MS. LANCASTER:

8 Q Have you found it, Mrs. Sumpter?

9 A Yes.

10 Q Do you recognize it?

11 A Yes.

12 Q What is it?

13 A It's an assignment of authorization.

14 Q Have you seen it before?

15 A Yes.

16 Q When did you first see it?

17 A January 28, 1998.

18 Q What were the circumstances in which you saw this  
19 document for the first time?

20 A Ronald brought it in and had me to sign it.

21 Q Okay, when you say brought it in, where were you?

22 A In my office.

23 Q When he brought it in, was it already filled out?

24 A I don't know. I assume it was, I don't know.

25 Q Well, did you fill it out?

1 A No.

2 Q Did you type any of the information, the  
3 typewritten information on this document? Did you type it?

4 A No.

5 Q Was it typed by anyone in your office?

6 A No.

7 Q Do you recall, when you first saw this document,  
8 whether the information was typed in at all?

9 A I don't remember. I don't remember at all.

10 Q The signature where it says "Norma Sumpter," the  
11 handwritten signature, is that your signature?

12 A Yes.

13 Q And you recall signing it?

14 A Yes.

15 Q The date next to it says 1/28/98. Did you put  
16 that date there?

17 A Yes.

18 Q Was that the date that you signed this document?

19 A Yes.

20 Q Did you sign it on the same day that it was first  
21 presented to you?

22 A Yes.

23 Q What did you do with it after you signed it?

24 A I gave it back to Ronald.

25 Q Was this the only assignment of authorization



1 Ronald brought to you that day?

2 A No, he brought Jim's.

3 Q And did Jim sign his, also?

4 A Yes.

5 Q What did Jim do with his after he signed it?

6 A He gave it back to Ronald.

7 Q Do you know what this document does?

8 A This is the transfer.

9 Q The transfer of what?

10 A The radio license.

11 Q What radio license?

12 A WPJR739.

13 Q And what is WPJR739?

14 A It's a license. What do you mean, what is it?

15 Q Do you know which license this is referring to?

16 A I believe the one in Net Wave.

17 Q The one that was mentioned in the Net Wave

18 petition?

19 A Yes, ma'am.

20 Q Okay. Turn to Exhibit 19, which is that other

21 big notebook, page 439.

22 JUDGE STEINBERG: I will get you close.

23 THE WITNESS: Four what?

24 MS. LANCASTER: Four-thirty-nine.

25 BY MS. LANCASTER:

1 Q Do you ever recall receiving any kind of a green  
2 card in the mail?

3 A Yes, ma'am.

4 Q Okay. Do you know when you received it?

5 A No.

6 Q Do you know if you recognize -- well, do you ever  
7 recall receiving any kind of yellow card in the mail?

8 A I don't know.

9 Q You do not recall, or --

10 A I don't really, I don't recall seeing the yellow.  
11 I remember green, but --

12 Q Do you recognize anything on page 439 of  
13 Exhibit 19?

14 A Do I recognize anything on that?

15 Q Yes, does any of that look familiar to you?

16 A I believe the green card and yellow card. I  
17 don't know.

18 Q Well --

19 A What do you mean, do I recognize it?

20 Q Well, you stated you remember receiving a green  
21 card, is that correct?

22 A That's right.

23 Q The bottom half of the page, of 439, do you see  
24 some writing on the bottom half of the page?

25 A Yes.

1 Q Next to where it is handwritten "green card?"

2 A Yes.

3 Q Do you recognize that?

4 A I think that's Jim's handwriting.

5 Q Okay.

6 JUDGE STEINBERG: Let me -- do you remember  
7 receiving a green card?

8 THE WITNESS: Yes.

9 JUDGE STEINBERG: What did you do with the green  
10 card?

11 THE WITNESS: I would have mailed it to Ronald  
12 Brasher.

13 JUDGE STEINBERG: Do you remember mailing it to  
14 Ron?

15 THE WITNESS: If I received it, I mailed it to  
16 him.

17 JUDGE STEINBERG: Did you read it before you  
18 mailed it?

19 THE WITNESS: No.

20 MR. ROMNEY: Before you mailed what?

21 JUDGE STEINBERG: The green card. Do you want me  
22 to go over that again?

23 MR. ROMNEY: Yes. I am sorry, yes.

24 JUDGE STEINBERG: Okay. The question was, I  
25 guess, did you remember seeing the green card, or receiving

1 a green card. The answer was yes. Is that correct?

2 THE WITNESS: That's correct.

3 JUDGE STEINBERG: The question was, what did you  
4 do with the green card. The answer was, "I mailed it to  
5 Ron." Is that correct?

6 THE WITNESS: That's correct.

7 JUDGE STEINBERG: Anything you want to add to  
8 that?

9 THE WITNESS: No.

10 JUDGE STEINBERG: Did you read it before you  
11 mailed it? And the answer was?

12 THE WITNESS: No.

13 BY MS. LANCASTER:

14 Q How many green cards do you remember receiving?

15 A I don't have any idea. I don't know.

16 Q Had you received mail previously regarding, mail  
17 that would be concerning FCC matters?

18 A Yes, ma'am.

19 Q When did you first start receiving mail that  
20 concerned FCC matters?

21 A After I signed the first application, either late  
22 eighties or early nineties.

23 Q Did you open the mail when you got it?

24 A When I first got the mail, I opened it. But  
25 later on, I didn't open it.

1 Q Well, when you -- let me clarify that a little  
2 bit. When you said when you first got it, does that mean  
3 when you went to the mailbox and first got it?

4 A Yes.

5 Q Okay. And did that practice continue on every  
6 time you got mail?

7 A Correct.

8 Q For how long a period? Forever?

9 A I'm still getting mail.

10 Q Are you still opening it?

11 A Well, I'm opening it now.

12 Q Was there ever a time when you did not open it  
13 when you got mail?

14 A Yes.

15 Q What time period was that?

16 A I don't know. I can't tell you how long, or when  
17 I did it. At the beginning when I first, I got it, I opened  
18 it, and I would put it in an envelope and send it to Ron.  
19 But to me it became all the same stuff, so I didn't open it.

20 Q Why did you send it to Ron?

21 A Because he told me to.

22 Q When did he tell you that?

23 A When he asked me to get the license.

24 Q And that is the first license you talked about?

25 A Yes, ma'am.

1           Q     And after he asked you to send him mail relating  
2 to that first license, did he ever ask you any other time to  
3 forward mail to him?

4           A     Well, he just told me anything that he received,  
5 that I received that wouldn't be connected to, you know, had  
6 FCC or something like that on the envelope, just to mail it  
7 to him.

8           Q     And did you do that from there on out?

9           A     Yes.

10          Q     Back in 1996, were you opening the mail when you  
11 got it? Anything that was related to FCC?

12          A     No, I wasn't opening it.

13          Q     Were you still forwarding it on to Ronald?

14          A     Yes.

15          Q     Would you please turn to Exhibit 45?

16          A     Which book?

17          Q     We are going to go back to that one.

18                   (Pause.)

19          Q     I believe you have already testified that you  
20 recognize this document, and that you signed page six. Is  
21 that correct?

22          A     That's correct.

23          Q     When was this document prepared?

24          A     April 9, 1999.

25          Q     Do you know why it was prepared?

1           A     We got John to prepare it for us.

2           THE REPORTER: I am sorry, the microphone was  
3 being moved, and the sound might have obscured some of her  
4 answer. I do not mean to be rude, but it is a fact.

5           BY MS. LANCASTER:

6           Q     Do you know why it was prepared?

7           A     Why it was prepared?

8           Q     Yes, ma'am.

9           A     Because we had John to prepare it for us.

10          Q     But do you know why you wanted John to prepare  
11 it?

12          A     Well, it was answering to the Net Wave.

13          JUDGE STEINBERG: And who is John?

14          THE WITNESS: My lawyer.

15          JUDGE STEINBERG: Mr. McVeigh?

16          THE WITNESS: Mr. McVeigh.

17          BY MS. LANCASTER:

18          Q     Was it your understanding this was going to be  
19 used to respond to the Net Wave allegations?

20          A     Yes.

21          Q     Do you realize that the Net Wave --

22          MS. LANCASTER: Just trying to speed things  
23 along.

24          BY MS. LANCASTER:

25          Q     What is the purpose, what is your understanding

1 of the purpose of this hearing?

2 A The purpose?

3 Q Yes, ma'am. Why are we here having a hearing?

4 A Because, I don't know, really. Just because  
5 there's some --

6 JUDGE STEINBERG: I mean, other than to give you  
7 a free vacation in Washington.

8 (Laughter.)

9 THE WITNESS: Well --

10 JUDGE STEINBERG: This is Publisher's  
11 Clearinghouse's sort of door prize.

12 THE WITNESS: Ask me again.

13 BY MS. LANCASTER:

14 Q Why do you think we are having, the FCC is  
15 holding a hearing in this matter?

16 A Why?

17 Q Mm-hmm.

18 A Because they feel like there was some deception  
19 the way the licenses were obtained.

20 MR. ROMNEY: I did not hear the last part of  
21 that.

22 JUDGE STEINBERG: I did not, either.

23 MS. LANCASTER: I believe she said --

24 JUDGE STEINBERG: Why don't you restate it?

25 THE WITNESS: She has asked me why were we here.



1 I said I felt like because there was some deception in the  
2 way the licenses were obtained.

3 MR. ROMNEY: Thank you.

4 BY MS. LANCASTER:

5 Q Are we here because of the Net Wave petition

6 A It started it.

7 Q Aside from the fact that it started it, is there  
8 any other connection between why we are here and the Net  
9 Wave petition?

10 A I don't know.

11 Q Looking back at Exhibit 45, do you see where it  
12 says Q-1? It is in parentheses, second paragraph?

13 A Question one.

14 Q Right, question one.

15 A Yes.

16 Q And did you see A-1?

17 A Yes.

18 Q Is A-1 an answer to Q-1?

19 A Yes, it is.

20 Q Is it your answer to that question?

21 A Yes, it is.

22 Q Who wrote the language in A-1? Who wrote the  
23 words?

24 A I did.

25 Q You actually wrote out all of these words?

1           A     Yes.

2           Q     Okay. Do you see Q-2 on page three?

3           A     Page three?

4           Q     Two?

5           A     Yes, ma'am.

6           Q     And you see A-2, right under it?

7           A     Yes.

8           Q     Is A-2 the answer to the question contained in

9   Q-2?

10          A     Yes, it is.

11          Q     And who wrote out the words that go with, that

12   are in A-2?

13          A     I did.

14          Q     You composed the language that is in that

15   paragraph?

16          A     I composed it.

17          Q     Okay. The facts that are stated in response to

18   all the questions in this declaration, are they facts -- is

19   it your understanding of the facts that are presented in

20   this declaration?

21          A     Yes, ma'am.

22          Q     Did anybody tell you what you were supposed to

23   put in here?

24          A     No, ma'am.

25          Q     Are the facts as, the answers to the questions in

1 here, are they answered the way you would answer them?

2 A Yes, ma'am.

3 JUDGE STEINBERG: With respect to the other  
4 questions and answers, did you also write out the answers in  
5 your own words?

6 THE WITNESS: Yes, I did.

7 JUDGE STEINBERG: So it was not just those two  
8 questions that --

9 THE WITNESS: No, the whole thing.

10 JUDGE STEINBERG: -- Ms. Lancaster asked you  
11 about. The whole thing?

12 THE WITNESS: The whole thing.

13 BY MS. LANCASTER:

14 Q When you wrote out the answers in your own words,  
15 what did you do with what you wrote out?

16 A What did I do with it?

17 Q Yes. Did you give it to anybody?

18 A Well, I gave it to John, Mr. McVeigh.

19 Q And who actually prepared the typewritten  
20 declaration?

21 A He did.

22 Q Did he take your answers and use them?

23 A Yes.

24 Q Look at Exhibit 34. Look on page 17 of  
25 Exhibit 34. Do you see your name on that page?